

22 cr 40 JRT/LIB

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

8 U.S.C. § 1324(a)(1)(A)(ii)

8 U.S.C. § 1324(a)(1)(A)(v)

v.

8 U.S.C. § 1324(a)(1)(B)(i)

STEVE ANTHONY SHAND,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Bringing In and Harboring Certain Aliens – Illegal Domestic Transporting)

On or about January 19, 2022, in the State and District of Minnesota, the defendant,

**STEVE ANTHONY SHAND,**

aided and abetted by others and aiding and abetting others known and unknown to the grand jury, knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, transported, and moved and attempted to transport and move such alien, to wit: S.P. within the United States by means of transportation or otherwise, in furtherance of such violation of law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v), and 1324(a)(1)(B)(i).

**COUNT 2**

(Bringing In and Harboring Certain Aliens – Illegal Domestic Transporting)

On or about January 19, 2022, in the State and District of Minnesota, the defendant,

**STEVE ANTHONY SHAND,**



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aided and abetted by others and aiding and abetting others known and unknown to the grand jury, knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, transported, and moved and attempted to transport and move such alien, to wit: Y.P. within the United States by means of transportation or otherwise, in furtherance of such violation of law, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v), and 1324(a)(1)(B)(i).

### **FORFEITURE ALLEGATIONS**

Counts 1 and 2 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6).

Upon conviction of the offense in Counts 1 or 2 of this Indictment, the Defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(6):

- (A) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and
- (B) any property, real or personal –
  - i. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; or
  - ii. that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

The property to be forfeited includes, but is not limited to, the following: two

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black-colored Samsung cellular telephones bearing IMEI numbers 359011830852004 and 350336260884618.

If any of the above-described forfeitable property is unavailable, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON